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REGION VIII

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Mr. Robert M. Nelson, Jr., Manager
BISHOP.ML

Department of Energy
Rocky Flats Office
P.O. Box 928
Golden, CO 80402-0928

Re: Radioactive Contamination

at SWMU 115 Old Landfill

Dear Mr. Nelson:

On June 7, 1990, EPA and Colorado Department of Health (CDH) Hazardous Waste Management Inspectors investigated the old landfill, SWMU 115 in operable unit 5 (OU 5). The purpose of the inspection was to evaluate exposed radioactive debris in the old landfill and determine if a threat of release or exposure was present.

The inspectors were accompanied in the field by Mr. Scott Grace. Mr. Grace pointed out an area in the northwestern part of the old landfill displaying, with a field survey instrument, radioactivity elevated above background concentrations. It should be noted that during the June 7, 1990, inspection, Mr. Grace exercised great caution in avoiding exposure to all members of the group. Mr. Grace and Mr. Olsen criginally identified the area as containing elevated levels of radiation a few months prior to the June 7, 1990, inspection by EPA and CDH.

EPA is concerned that the area of elevated radioactivity is susceptible to accelerated erosion causing potential releases of radionuclides to surface water during periods of high runoff. In addition, the area is not adequately marked identifying the locality as potentially hazardous and needing restricted access.

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The old landfill is scheduled to undergo investigation per the Interagency Agreement (IAG) between DOE, EPA, and CDH during fiscal year 1991. EPA feels that although investigation is designated as a priority under clean up actions, steps to protect any potential exposure and to evaluate the need for an IM/IRA as per the Section I.B.10. of the IAG should be taken immediately. In this regard, EPA strongly recommends the following actions be taken at the old landfill:

- Immediately restricting access by roping or fencing off and posting appropriate warning signs of the known areas within SWMU 115 exhibiting elevated radioactivity,
- 2. Performing a preliminary radiologic survey along the entire SWMU to identify other potential areas of concern and the potential for release of radioactivity to surface water drainages, i.e., the south interceptor ditch and Woman Creek.

Plans for this additional preliminary work should be presented to EPA and CDH for review and approval. Results of this initial work will need to be evaluated to determine potential releases from contaminated debris and the associated risks. EPA must be so notified prior to initiating activity at SWMU 115 and informed of the results of any preliminary investigations.

EPA would like to discuss this matter further with members of your staff on or before July 27, 1990. You can contact Mr. Martin Hestmark at 294-1132 or Ms. Patricia Corbetta at 294-1135 regarding this matter.

Louis W. Johnson, Chief Remedial Federal Facilities Branch

PAC/ese

Robert L. Duprey, 8HWM-FF Martin Hestmark, 8HWM-FF Peter Ornstein, 80RC Patricia Corbetta, 8HWM-FF Sonya Pennock, 80EA Fred Dowsett, CDH